



**Intercontinental Terminals Company (ITC) Fire Morning Update
Deer Park, Texas
March 30, 2019 0000 – March 30, 2019 1159**

Incident Management Objectives:

Objective 1: Ensure the health and safety of the public and response personnel.

Objective 2: Establish an incident management structure and processes employing the Incident Command System to enable effective overall management of the event with deployment of resources (staff and equipment) in a rapid, focused and well-coordinated manner.

Objective 3: Encourage a collaborative federalism approach, where Federal, State, Tribal, and local governments interact cooperatively and collectively to solve common problems.

Objective 4: Take actions to assess the on-site and off-site impacts during the emergency response phase of this incident. Provide this information to state and local authorities to assist them in their decision to protect the local citizens.

Objective 5: Conduct activities to prevent off-site releases from the ITC Tank Farm.

Objective 6: Respond to, mitigate and recovery off-site releases from the ITC Tank Farm.

Objective 7: Maintain open communication with Regional management

Incident Overview:

On March 17, 2019, an above ground storage tank containing Naphtha, caught fire at the Intercontinental Terminal Company (ITC), LLC facility in Deer Park Texas. The ITC facility consists of 15 80,000-barrel capacity above ground storage tanks containing petroleum products including Naphtha, Xylene, Toluene, Gasoline Blendstock, and Base Oil. Eleven of the 15 80,000-barrel capacity above ground storage tanks on site were involved in the fire, resulting in the release of contaminants into the atmosphere, as well as discharging the contents of the tanks to drainage pathways. Firefighting water and foam potentially containing petroleum products were released from an outfall due to accumulation of water from firefighting efforts. Various firefighting organizations assisted in putting out the fire utilizing a variety of firefighting foams.

A partial breach of the tank farm containment wall on the northeast side near Tank 80-7 occurred at approximately 12:00 pm on March 22, 2019, to the ditched area and into Tucker Bayou. Additional boom was placed along the ditch leading to Tucker Bayou and Buffalo Bayou (Houston Ship Channel). The Responsible Party's contractor has rebuilt the containment wall using clay material.

At approximately 3:40 pm on March 22, 2019, three tanks reignited. The fire spread from the containment area through the breached containment wall into the ditch along Tidal Road. Foam was applied to the tanks and the ditch to extinguish the fire.

During and after the fire and the breach of the secondary containment, several readings of benzene above 1.0 ppm were detected (highest was 16.5 near National Tank Services) by the various entities conducting air monitoring through the afternoon and night. These readings were located along the ship channel.

The United States Coast Guard (USCG) Captain of the Port is continuing the controlled open for the Ship Channel on March 26, 2019, with traffic during the daytime only. Decontamination vessels are being positioned to help ships that may have residue on the hulls.

Due to the initial fires and subsequent releases, shelters in place have occurred throughout the week of March 17, 2019.

Executive Overview:

- Harris County Pollution Control provided an update of information regarding facilities east and south of ITC that enacted a shelter-in-place on March 30, 2019, due to elevated benzene readings. The following table provides the enacted and lifted times for the facilities:

Facility	Enacted Time	Lifted Time
Oxy Vinyls LaPorte VCM	2:28 pm	2:55 pm
LyondellBasell (1515 Miller Cut Off Road)	2:28 pm	Later in night
Oxy Vinyls Battleground	2:30 pm	2:55 pm
INEOS (1230 Independence Parkway)	3:31 pm	Later in night
Geo Specialty Chemicals	3:31 pm	Later in night
Nouryon Polymer Chemicals Battleground	4:49 pm	Later in night
Braschem (8811 Strang Road)	5:08 pm	Later in night

- At 2:00 am on March 31, 2019, ITC held a call with the stakeholders and industrial partners. Most reported lowered benzene readings (around 0.5 ppm).
- Independence Parkway north of Highway 225 was closed to public traffic for part of March 31, 2019, due to elevated benzene readings.
- On March 30, 2019, ITC requested that the Texas Commission on Environmental Quality (TCEQ) finish their review and comments of the Documentation plan. TCEQ will work the issue on March 31, 2019.
- On March 30, 2019, the United States Coast Guard (USCG) and ITC were working on financial and operational issues with the Texas Responder ship.
- The Executive Director of the TCEQ (Toby Baker), the Commander of the USCG 8th District (Paul Thomas), as well as the Acting Regional Administrator of EPA Region 6 (David Gray) will be visiting the site on Monday, April 1, 2019. EPA notified the Joint Information Center of the visit.
- Foaming of the secondary containment to prevent reignition and reduce emissions continues as necessary.
- EPA conducted surface water sampling on March 30, 2019, at ten sample locations. Samples were collected from upstream of the confluence of Buffalo Bayou and the San Jacinto River (in the Old River at River Terrace Park and at the shoreline of Juan Sequin Historic Park), in the main channel of the San Jacinto River (upstream of the confluence with Buffalo Bayou), and downstream in the San Jacinto River. The surface water samples will be analyzed for Per- and polyfluoroalkyl substances, Volatile Organic Compounds (VOCs), Semi-volatile Organic Compounds (SVOCs), Chemical Oxygen Demand (COD), and Oil & Grease.
- Several entities including TCEQ, EPA, and ITC continue to conduct air monitoring around the tank farm, in adjoining industrial areas, and communities downwind from the facility.
- A Strike Team, comprised of EPA, TCEQ, and ITC were sent to the areas around Deer Park (south of the site) due to elevated readings of benzene during the afternoon and night on March 30, 2019. Unified Command and Harris County were kept apprised of the readings.
- The Airborne Spectral Photometric Environmental Collection Technology (ASPECT) aircraft did not fly during this reporting period.
- EPA conducted air sampling using the Trace Atmospheric Gas Analyzer (TAGA) on March 30, 2019. The TAGA analyzed the air samples for benzene, toluene and xylene. The TAGA air sampling results were compared to the Texas Commission on Environmental Quality (TCEQ) short-term Air Monitoring Comparison Values (AMCVs) and found no exceedances of the short-term AMCVs for toluene and

xylene. The TAGA air sampling results found exceedances of the short-term AMCV for benzene (0.18 ppm). These exceedances of the short-term AMCV for benzene were north and southeast of the ITC site and have been shared with unified command and local officials.

- EPA conducted handheld air monitoring from March 30, 2019 (12:00 am) to March 30, 2019 (11:59 pm) at 50 locations in areas near the Site as well as Buffalo Bayou. Results were reported above the detection limit at ten locations for total volatile organic compounds (VOCs) and eight locations for benzene. Benzene was detected at eight of these locations above the short-term AMCVs for benzene (0.18 ppm). Benzene was detected at four of these locations above the occupational level (1.0 ppm). EPA will conduct additional air monitoring and deploy the Trace Atmospheric Gas Analyzer (TAGA) to determine if the short-term AMCV for benzene continues to be exceeded.
- ITC continued air monitoring on March 30, 2019 (from 12:00 am to 11:59 pm); there were 3,276 VOC readings (684 detections) with and 2,634 benzene readings (568 detections).
- TCEQ continued handheld air monitoring on March 30, 2019 (from 12:00 am to 10:00 pm); there were approximately 165 readings were taken. No readings above the Unified Command action level were detected.
- As of 6:00 pm on Saturday, March 30, 2019, ITC had deployed 112,400 feet of boom, 56,162 barrels (bbl) of product/water was recovered from water operations, and 40,385 bbl of product/water was recovered from tank farm.
- Vacuum truck operations at Tucker Bayou and the outfall ditch continue on 24-hour basis.
- On March 30, 2019, ITC continues to empty the impacted tanks into non-impacted tanks, secondary containment, or the wastewater treatment tank. The following table provides the status of the tanks:

Tank Status	Tank No.
Complete	80-2, 80-3, 80-7, 80-10, 80-12, 80-13, 80-14, 80-15
In Process	80-11 (to be emptied by March 31, 2019 or April 1, 2019)
Standby	80-1, 80-4, 80-5, 80-6, 80-8, 80-9

Coordination with State Agencies:

On March 17, 2019, in response to a tank fire at the ITC, federal, state and local agencies joined ITC in a Unified Command. Multiple agencies including the United States Coast Guard, the TCEQ, and Harris County Pollution Control Services supported the response effort.

EPA Resources:

Personnel	EPA R6 Dallas	ITC Deer Park	Total
EPA Region 6	7	7	14
EPA Non-Region 6	0	3	3
START	1	14	15
Other Contractors	0	8	8
Total	8	32	40

Additional Information: Air Monitoring and Water Sampling locations:

